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March 27, 2025

**VIA ECF-PACER**

Hon. David N. Hurd  
United States District Court  
Northern District of New York  
Alexander Pirnie Federal Building and U.S. Courthouse  
10 Broad Street  
Utica, New York 13501

Re: *Adirondack Trust Company v. Maha Laxmi Corp., et. al.*  
1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Hurd:

This firm represents Plaintiff Adirondack Trust Company (“ATC”) in the above-referenced action against Maha Laxmi Corp., Maha Laxmi II Corp., Jagdamba Inc., Jagdamba II Corp., Jagdamba III Corp., Jagdamba V Corp., Jagdamba VI Corp., Northeast Dining & Lodging, Inc., Poughkeepsie GC, Inc., Syracuse GC, Inc., Niral A. Patel, and Nirmala A. Patel (collectively “Defendants”). As the Court is aware, summary judgment motions for this action must be filed on or before April 4, 2025. (Dkt. 97).

In accordance with Local Rule 7.1(b)(l), we write on behalf of all parties to request permission to file oversized memorandums of law, not to exceed forty (40) pages, in support of the parties’ respective summary judgment motions. An oversized memorandum is necessary for ATC’s summary judgment motion because it is seeking judgment on affirmative claims in its supplemental and amended complaint and dismissal of all three counterclaims in Defendants’ answer, and because of the relatively complex nature of the claims.

Defendants are likewise seeking to file an oversized memorandum as Defendants are seeking judgment dismissing all of ATC’s claims and also seeking affirmative relief on Defendants’ counterclaims against ATC. Defendants concur with ATC that the claims at issue in this matter are complex and there are substantial facts obtained through lengthy discovery underlying both ATC’s claims and Defendants’ counterclaims.

Please contact me if the Court has any questions.

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Respectfully,

A handwritten signature in black ink, appearing to be 'CB' with a stylized flourish.

Christopher E. Buckey

cc: All Counsel of Record (via ECF-PACER)